

David E. Patton
Executive Director

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

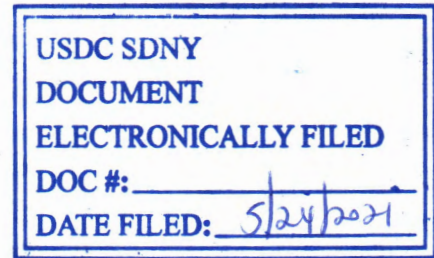
May 21, 2021

BY ECF

Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

5/24/2021
Application denied
[Signature]

Re: United States v. Christian De La Torre Villavazo
20 Cr. 584 (CM)



Honorable Judge McMahon:

I write to request that the Court modify Mr. De La Torre's bail conditions to allow him to participate in an overnight religious celebration of Pesach Shenni (Second Passover), organized by his church in Tucson, Arizona. Exhibit A (Letter from Rev. Alfred Kerr). The celebration would take place Thursday, May 27, 2021 to Sunday, May 30, 2021, on a public campground on Mount Lemmon, AZ 85619. Pretrial opposes the modification as a matter of policy for all individuals on location monitoring. The Government defers to Pretrial.

Since, April 13, 2020, Mr. De La Torre has been under Pretrial supervision with the following conditions: A \$25,000 personal recognizance bond co-signed by two FRPs; home detention in Tucson, AZ enforced by location monitoring; travel limited to SDNY/EDNY and District of Arizona; surrender travel documents (and no new applications); no contact with co-defendants except in the presence of counsel; Pretrial Supervision as directed by PTS. He has been compliant with his conditions of release.

If the Court grants this request, Mr. De La Torre would travel with members of his church to a public camping ground on Mount Lemmon, AZ, just north of Tucson, Arizona, where Mr. De La Torre lives. He would be accompanied by Reverend Kerr, the Senior Pastor at Tucson Faith Assembly of God. Reverend Kerr is also one of the co-signers to Mr. De La Torre's bond and has provided housing to Mr. De La Torre and his family on church grounds since Mr. De La Torre's arrest. Mr. De La Torre and other church members would observe Pesach Shenni together at Mount Lemmon from May 27, 2021 to May 30, 2021. He would immediately

return home on May 30.

This is an important religious holiday for Mr. De La Torre, and he hopes to have the opportunity to observe it during this event organized by his Church. As noted above, he has been compliant on pretrial release.

Thank you for your consideration of this request.

Respectfully Submitted,

/s/
Zawadi Baharanyi
Assistant Federal Defender
917-612-2753

So Ordered:

HONORABLE COLLEEN MCMAHON
UNITED STATES DISTRICT JUDGE

cc: AUSA Ni Qian/Elizabeth Espinosa.



Tucson Faith Assembly of God Church
335 E. Elvado Rd.
Tucson Az, 85756

05/05/2021

To whom it may concern,

My name is Alfred Kerr and I'm the senior pastor of Tucson Faith Assembly of God. May this letter serve as a reference for Mr. Christian Omar De La Torre for permission to observe the following faith based Holiday: Pesach Shenni, (2nd Passover). As a Jewish Christian community we are commanded by God to celebrate and observe several feast days that are important to us as believers. This year we will celebrate the holiday as we usually do camping as a church on the following dates:

- **Thursday May 27, 2021 – Sunday May 30, 2021**

We will be camping at a public campground on Mount Lemmon AZ 85619, close to the University of Arizona observatory, a mountain here in our city. These are the coordinates (32.416420, -110.731375). As a pastor its always my desire that (all) our church community can participate together and he is no exception.

We thank you beforehand for your consideration of allowing Mr. Christian Omar De La Torre to participate with his family and church family during these important holidays

If you have any further questions please feel free to contact me by email or phone, below is my information it's easier to reach me on my cell phone.

Best Regards,

Rev. Alfred Kerr
Tucson Faith Assembly of God
Senior Pastor